

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
Martin Wellington :
: Bankruptcy Case No.: 22-10990-MDC
:

**MOTION TO MODIFY PLAN AFTER CONFIRMATION
AND TO APPROVE LOAN MODIFICATION**

Martin Wellington (the “Debtor”), by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan After Confirmation and Approve Loan Modification, in support thereof respectfully states the following:

1. Debtor filed a Chapter 13 Petition on April 18, 2022 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed on October 05, 2022.
3. The Debtor owns real property located at 508 Crossfield Road, King of Prussia, PA 194063 (the “Property”).
4. The Property is encumbered by a mortgage held by Chase Bank, N.A. (the “Mortgagee”).
5. After the Petition Date, the Debtor accrued post-petition mortgage arrears in the amount of \$4,282.08.
6. On or about June 29, 2022, the Mortgagee approved the Debtor for a loan modification, through which the post-petition mortgage arrears will be deferred. A copy of the loan modification is attached hereto as Exhibit “A”.
7. The loan modification is in the best interest of the Debtor and has no prejudicial effect on the Debtor’s unsecured creditors.

8. The Debtor is concurrently filing a Motion to Modify Plan After Confirmation to accommodate additional counsel fees incurred while facilitating the Debtor's loan modification, Motion for Approval of Loan Modification, and subsequent Motion to Modify Plan and modified plan.

9. The Modified Chapter 13 Plan (attached hereto as Exhibit "B") will provide for plan payments in the amount of \$328.00 per month for the remaining 49 months for a new base amount of \$19,372.00.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an Order granting the Motion to Modify Plan After Confirmation and Approve Loan Modification, and for such other and further relief as the court deems just and appropriate.

Respectfully submitted,

Dated: March 22, 2023

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Sadek and Cooper Law Offices
Two Penn Center
1500 JFK Boulevard, Suite 220
Philadelphia, PA 19102
Phone (215) 545-0008
Facsimile (215) 545-0611
brad@sadeklaw.com

Counsel to the Debtor